

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA**

v.

JUDGE MANNION

**\$5,430.00 U.S. Currency, and \$12,570.45  
Seized from Community Bank acct. ending:  
In 6994**

Defendants

NO. 3:18-CV-01400

**ANSWER TO COMPLAINT FOR FORFEITURE *IN REM***

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. No responsive pleading required.
7. No responsive pleading required.
8. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
9. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
10. Admitted.

11. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
12. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
13. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
14. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
15. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
16. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
17. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial/
18. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
19. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.
20. Denied. The allegation in this paragraph represents a conclusion of law and or fact to which no responsive pleading is required. Strict proof thereof is demanded at trial.

WHEREFORE, the Defendant prays that the forfeiture request of the United States be DENIED.

/s/ Robert J. Levant  
Robert J. Levant, Esq.

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**CERTIFICATE OF SERVICE**

I, Robert J. Levant, Esquire Counsel for Defendants, do hereby certify that we have served a copy of the attached, **ANSWER TO COMPLAINT FOR FORFEITURE *IN REM*** upon the following:

Office of the Clerk-United States District Court for the Middle District of Pennsylvania  
228 Walnut Street  
Harrisburg, PA 17108

Jenny P. Roberts, Assistant U.S. Attorney  
235 North Washington Ave.  
Scranton, PA 18503

Dated: October 15, 2018

/s/ Robert J. Levant  
Robert J. Levant, Esquire